

REMARKS

Claims 1-14, 18-21, 23-24, 26-43, 45, 48-49, 51-57 and 60-61 are now pending in the application with claims 23-24, 26-43, 45, 48-49, 51-54 and 56-57 having been withdrawn from consideration. Claims 15-17, 22, 25, 44, 46-47, 50, and 58-59 are cancelled herein to reflect the identical claims cancelled in the Article 19 amendment to the International Application No. PCT/GB2003/004754 received by the International Bureau on August 9, 2004. The appropriate status identifiers have been included for clarity. Support for the foregoing claim amendments can be found throughout the specification, drawings, and claims as originally filed. The Applicant thanks the Examiner for providing tables of the various compositions under examination and for the description of the alloys of the cited art of record for the purpose of comparison. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

CLAIM OBJECTIONS

Claims 14, 17-19, 21-22, 55, 60 and 61 are objected to under 37 CFR 1.75(c) as being in improper form because a multiple dependent claim cannot serve as a basis for another multiple dependent claim. Claim 4 is objected to under 37 CFR 1.75(c) as being of improper dependent form for failing to further limit the subject matter of a previous claim.

Applicant has amended Claims 14, 18, 19, 21, 55, and 60-61 to correct the dependency of these claims so that they do not depend on a further multiple dependent claim as proscribed by 37 CFR 1.75(c).

Applicant has amended Claim 4 to recite a percentage of cobalt that is more restricted than the percentage of cobalt in the independent Claim 1. Hence, the amended Claim 4 further limits Claim 1 with at least the specified ranges of cobalt being broader in Claim 1 than in Claim 4.

Appropriate corrections to the above objected to claims having been made, Applicant requests reconsideration and withdrawal of these objections.

REJECTION UNDER 35 U.S.C. § 112

Claim 20 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point and distinctly claim the subject matter which Applicant regards as the invention. This rejection is respectfully traversed.

The Applicant has amended Claim 20 to remove any alleged indefiniteness by particularly stating the percentage composition of niobium, titanium and zirconium in the “with the proviso that at least one of...” clause and removing any additional percentage recitation of these materials from the claim. Applicant respectfully submits, that when one or more of niobium, titanium and zirconium materials are present, there is only one percentage attributed to each material in the alloy composition.

Accordingly, Applicant respectfully requests that the present rejection of Claim 20 be reconsidered and withdrawn.

REJECTION UNDER 35 U.S.C. § 103

Claims 1, 10 and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Klöwer (U.S. Pat. No. 5,851,318, hereinafter “Klöwer”) with evidence from Deevi et al. (“Exo-Melt process for melting and casting intermetallics”, published 1997, hereinafter “Deevi”) in view of Ritzert et al. (“Single crystal fibers of yttria-stabilized cubic zirconia with ternary oxide additions”, published 1998, hereinafter “Ritzert”). This rejection is respectfully traversed.

From the outset, the Applicant respectfully submits that neither Klöwer, Deevi nor Ritzert render independent Claim 1 and claims dependent thereon obvious for the following reasons.

The action alleges that it would have been obvious to one of ordinary skill in the art to have added high purity fine particles such as hafnium oxide as disclosed by Ritzert to the high temperature alloy as disclosed by Klöwer with evidence from Deevi.

Applicant respectfully submits that Klöwer with evidence from Deevi in view of Ritzert fails to raise a *prima facie* case of obviousness. A finding of obviousness under 35 U.S.C. § 103 requires a determination of the scope and the content of the prior art, the differences between the invention and the prior art, the level of the ordinary skill in the art, and whether the differences are such that the

claimed subject matter as a whole would have been obvious to one of ordinary skill in the art at the time the invention was made. *Graham v. Deere*, 383 U.S. 1 (1966). The relevant inquiry is whether the prior art suggests the invention, and whether one of ordinary skill in the art would have had a reasonable expectation that the claimed invention would be successful. *In Re O'Farrell*, 853 F.2d 894, 902-4 (Fed. Cir. 1988); *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991). Both the suggestion of the claimed invention and the expectation of success must be in the prior art, not in the disclosure of the claimed invention. *In re Dow Chemical Co.*, 5 U.S.P.Q.2d 1529 (Fed. Cir. 1988). In determining obviousness, “the inquiry is not whether each element existed in prior art, but whether the prior art made obvious the invention as a whole for which patentability is claimed.” *Hartness Int'l Inc. v. Simplimatic Eng'g Co.*, 819 F.2d 1100, 2 U.S.P.Q.2d 1826 (Fed. Cir. 1987). An analysis under 35 U.S.C. §103(a) “should be made explicit.” and “it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 2007 WL 1237834, at *14 and *15, respectively (2007). Furthermore, Applicant respectfully submits that hindsight reconstruction has been used to reconstruct the claimed invention. Such hindsight reconstruction, however, is improper. *In re Fine*, 837 F.2d 1071, 1074, 5 USPQ2d 1596, 1560 (Fed. Cir. 1988). Hindsight should be avoided in applying the nonobviousness requirement. *Panduit Corp. v. Dennison Mfg. Co.*, 810 F.2d 1561, 1 USPQ2d 1593 (Fed. Cir. 1987) 481 U.S. 1052 (1987).

Klöwer is drawn to high temperature forgeable alloys made from nickel, aluminum, chromium and iron. Klöwer characterizes the alloys as “[T]he alloy according to the invention has 10% aluminium and approximately 55 to 60% nickel close to the limit between the two-phase range (Ni)+ β_2 and the three-phase range (Ni)+ β_2 + α ” (Klöwer at col. 3, lines 10-13). Furthermore, the levels of aluminum and chromium are above 10% for both of these materials (Klöwer at col. 3, lines 40-45 and 66-67, and col. 4, lines 1 -7). In fact, Klöwer attributes the resistance to sulphidization in oxygen containing and low-oxygen media as being achieved by the combination of high chromium and high aluminum contents (*Id.*). With respect to the use of hafnium, Klöwer states: “However, the hafnium content must not exceed 0.2%, since in that case there is the danger of the formation of internal hafnium oxides, which would lead to an embrittlement of the material.” (Emphasis added, Klöwer at col. 4, lines 27-30.) Importantly, Klöwer fails to teach what percentage of oxygen and nitrogen are contained in any alloy composition.

Deevi is alleged in the Office Action (“Action”) to teach nickel-based alloys having high temperature corrosion resistance made by melting and conventional casting techniques that would have 0.013 weight percent oxygen and 0.013 weight percent nitrogen (Action at page 6). Deevi teaches that the process for making the intermetallic materials differ from the methods used conventionally to form such materials, for example, from ingots and the like. Applicant wishes to make the point that the impurities of oxygen and nitrogen reported in Table 6 on page 25 of Deevi are related to the method of making the molten material

described in Deevi, and are not taught to be low due to the addition of hafnium as presently taught in the Applicant's invention. (See Deevi at page 25, col. 2, lines 30-35, and spanning to page 26, col. 1, line 1.) In addition, the percentage of impurities (oxygen and nitrogen) described in Deevi are recited for an alloy which has a different composition to the examples recited in Klöwer and in the exemplified embodiments of the present invention. For example, the alloy compositions in Deevi (Table 6, page 25) are completely devoid of iron, manganese and magnesium among others and the percentage compositions of carbon, zirconium and silicon are vastly different. (Compare, Claim 1 with Klöwer and Table 6 of Deevi on page 25.) As such, one of ordinary skill in the art would not correlate the percentage composition of oxygen and nitrogen taught in Deevi to be necessarily present in the alloys of Klöwer because the elemental composition of the materials recited in the two references are different and the method of making the alloys in the two references are also different. Accordingly, Deevi cannot be used as evidence of nitrogen and oxygen concentrations in the compositions of the cited references or in the claimed compositions.

Ritzert is alleged to teach adding high purity fine particles such as hafnium oxide to alloys in order to improve high temperature reinforcement. (Action at page 7.) The Applicant respectfully disagrees with this characterization of Ritzert.

The Applicant respectfully submits that to establish a case of *prima facie* obviousness, all of the claim limitations must be taught or suggested in the prior art. MPEP 2143.03. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). In this particular case, none of the references either alone or in combination teach or

suggest the claimed element compositions, including the percentage compositions of oxygen and nitrogen or the presence of hafnium, wherein at least part of the hafnium is present as finely divided oxide as exemplified in the present invention. Ritzert teaches the use of single crystal oxide fiber reinforcement of metal and intermetallic composites (Ritzert at col. 1, page 5339). Ritzert teaches the use of yttria-stabilized cubic zirconia fibers integrated with ternary oxide including hafnium oxide. More importantly, the use of these yttria-stabilized cubic zirconia fibers is primarily for developing specific fibers for making intermetallic composites that exceed superalloy performance. Hafnium oxide ternary addition to yttria-stabilized cubic zirconia fibers was not employed for reducing oxygen impurities in intermetallic composites but rather for strengthening the fibers used in the reinforced intermetallic composites. (See Ritzert at page 5346, col. 1, lines 12-32.) Hence, Ritzert teaches away from adding elemental or molecular hafnium in the form of fine particles to any Ni-Cr-Fe alloy. Strengthening of the intermetallic composites in Ritzert is taught only to occur by adding yttria-stabilized cubic zirconia fibers having a ternary oxide in the form of HfO_2 . Ritzert teaches adding $\text{ZrO}_2\text{-}14\text{Y}_2\text{O}_3\text{-}5\text{HfO}_2$ fibers and not fine particles of hafnium to such intermetallic composites. Applicant respectfully submits that Ritzert fails to teach or suggest the addition of hafnium oxide fine particles to the alloy compositions prior or during the melt and, therefore, fails to cure the deficiencies of Klöwer in view of Deevi.

Without the benefit of hindsight, there is no suggestion in the references themselves to modify and/or combine the teachings of Klöwer, Deevi and Ritzert to obtain the present invention.

Thus, Claim 1 is believed to be patentable over Klöwer with evidence from Deevi in view of Ritzert. Dependent Claim 10 which depends from Claim 1 is believed to be patentable over Klöwer with evidence from Deevi in view of Ritzert for the reasons stated above. MPEP 2143.03. Dependent Claim 15 has been cancelled herein. Therefore, the rejection under 35 U.S.C. § 103(a) is rendered moot as to this claim.

For the foregoing reasons, Claim 1 and its dependent Claim 10 are believed to be patentable over Klöwer with evidence from Deevi in view of Ritzert. Withdrawal of the rejection is respectfully requested.

Claims 1, 9 and 11-13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kleeman (U.S. Pat. No. 6,409,847 hereinafter “Kleeman”) with evidence from Deevi and <http://dictionary.reference.com/browse/superalloy> (“Dictionary”) in view of Ritzert. This rejection is respectfully traversed.

Kleeman is drawn to austenitic nickel-chromium steels having high temperature resistance and high hot strength materials for the production of steel parts. The various compositions of Kleeman are provided in Tables 1 and 2 spanning columns 3 and 4. It is important to note that none of the alloys taught in Kleeman teach or suggest having oxygen and nitrogen in the percentage ranges exemplified in various embodiments of the present application. The Action states

that it would be expected that the nickel-chromium-iron alloy disclosed in Kleeman would also have 0.013 weight percent oxygen and 0.013 percent nitrogen as taught in Deevi. However, as described above, Deevi relates to Ni-Al intermetallic materials and differ from the compositions of the present application. For example, comparing the intermetallic composites in Table 6 on page 25 of Deevi with the compositions of Kleeman and in the exemplified embodiments of the present invention reveals various differences that would impact the concentrations of oxygen and nitrogen described therein. The Applicant respectfully submits that Deevi cannot be used as evidence of nitrogen and oxygen concentrations in the compositions of Kleeman and in the instant application.

Furthermore, Kleeman fails to teach that at least part of the hafnium is present as finely divided oxide particles. This deficiency is not cured by Ritzert since Ritzert fails to teach that fine particles of hafnium oxide are added to the alloy composition. Only ZrO_2 - $14Y_2O_3$ - $5HfO_2$ fibers are taught in Ritzert and these fibers are not finely divided hafnium oxide particles as recited in the various exemplified embodiments of the present invention.

For the foregoing reasons, Claim 1 and its dependent Claims 11-13 and Claim 9 are believed to be patentable over Kleeman with evidence from Deevi in view of Ritzert. Withdrawal of the rejection is respectfully requested.

Claim 2 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Kleeman with evidence from Dictionary in view of Ritzert. This rejection is respectfully traversed.

Applicant respectfully submits that Kleeman with evidence from Dictionary in view of Ritzert fails to teach and suggest all of the claim limitations of Claim 2. Kleeman and Ritzert have been discussed above.

Claim 2 also requires that the composition comprises at least part of the hafnium be present as finely divided oxide particles. As noted above, Ritzert fails to teach at least part of the hafnium be present as finely divided hafnium oxide particles added to an alloy composition.

For the foregoing reasons, Claim 2 is believed to be patentable over Kleeman with evidence from Dictionary in view of Ritzert. Withdrawal of the rejection is respectfully requested.

Claims 1, 10 and 15-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Barraclough (GB 2 083 499, hereinafter “Barraclough”) with evidence from Deevi and Dictionary in view of Ritzert. This rejection is respectfully traversed.

Barraclough is drawn to austenitic alloys of iron, chromium and nickel with further additions of aluminium and titanium, with or without additions of either hafnium or yttrium. It is important to note that none of the alloys in Barraclough teach or suggest having oxygen and nitrogen in the percentage ranges as exemplified in various embodiments of the present application. The Action states that it would be expected that the nickel-chromium-iron alloy disclosed in Barraclough would also have 0.013 weight percent oxygen and 0.013 percent nitrogen as disclosed by Deevi. However, as described above, Deevi relates to

Ni-Al intermetallic materials and differs from the compositions of Barraclough and of the present application. For example, comparing Table 6 on page 25 of Deevi with the compositions in the exemplified embodiments reveals various differences that would impact the concentrations of the oxygen and nitrogen present in the alloy. Deevi cannot be used as evidence of nitrogen and oxygen concentrations in the compositions of Barraclough or in the claimed compositions of the present invention.

Furthermore, Barraclough fails to teach or suggest that at least part of the hafnium is present in the alloy as finely divided oxide particles. This deficiency is not cured by Ritzert since Ritzert fails to teach that at least part of the hafnium is added as finely divided hafnium oxide particles to the alloy. Only ZrO_2 - $14Y_2O_3$ - $5HfO_2$ fibers are taught in Ritzert and these fibers are not finely divided hafnium oxide particles as recited in the various exemplified embodiments of the present invention. Claims 15-16 are presently cancelled and thus the present rejection of these claims is now rendered moot.

For the foregoing reasons, Claim 1 and its dependent Claim 10 are believed to be patentable over Barraclough with evidence from Deevi and Dictionary in view of Ritzert. Withdrawal of the rejection is respectfully requested.

Claim 2 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Barraclough with evidence from Dictionary in view of Ritzert. This rejection is respectfully traversed.

Applicant respectfully submits that Barraclough with evidence from Dictionary in view of Ritzert fails to teach and suggest all of the claim limitations of Claim 2. Barraclough and Ritzert have been discussed above.

Claim 2 also requires that the composition comprises at least part of the hafnium and be present as finely divided oxide particles. As noted above, Ritzert fails to teach at least part of the hafnium be present as hafnium oxide particles added to an alloy composition.

For the foregoing reasons, Claim 2 is believed to be patentable over Barraclough with evidence from Dictionary in view of Ritzert. Withdrawal of the rejection is respectfully requested.

Claims 1, 3-6, 8-13 and 15-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Herchenroeder (GB 1373386, hereinafter "Herchenroeder") with evidence from Deevi in view of Ritzert. This rejection is respectfully traversed.

Herchenroeder is drawn to nickel based alloys (Ni-Cr-Fe) which have oxidation resistance and resistance to development of cracks as a result of exposure to high temperature oxidizing atmospheres. The Applicant respectfully submits that Herchenroeder fails to teach the alloy compositions described herein. Specifically, Herchenroeder states: "Although various other common alloying ingredients such as zirconium, titanium, columbium or hafnium can be tolerated in small amounts in the present invention, they are merely incidental hereto and will generally be restricted to connate or adventitious amounts e.g. 1 or 2% by weight

of the alloy." Hence, Herchenroeder states that hafnium is not critical and need not even be included in the composition. The Action states that it would be expected that the nickel-chromium-iron alloy disclosed in Herchenroeder would also have 0.013 weight percent oxygen and 0.013 percent nitrogen as disclosed by Deevi. However, as described above, Deevi relates to Ni-Al intermetallic materials and differs from the compositions of the present application and in the methods of making such alloys (Exo-Melt process versus melting and casting). For example, comparing Table 6 on page 25 of Deevi with the compositions of Herchenroeder and the compositions of the exemplified embodiments of the present application, reveals various composition differences that would impact the concentrations of the oxygen and nitrogen. As such, Deevi cannot be used as evidence of nitrogen and oxygen concentrations in the compositions of Herchenroeder.

Furthermore, Herchenroeder fails to teach or suggest that at least part of the hafnium is present as finely divided oxide particles. This deficiency is not cured by Ritzert since Ritzert fails to teach compositions comprising hafnium oxide particles which are added to the melt. Only ZrO_2 - $14Y_2O_3$ - $5HfO_2$ fibers are taught in Ritzert and these fibers are not finely divided hafnium oxide particles as recited in the various exemplified embodiments of the present invention. Claims 15-16 are presently cancelled and thus the present rejection of these claims is now rendered moot.

For the foregoing reasons, Claim 1 and its dependent Claims 3-6 and 8-13 are believed to be patentable over Herchenroeder with evidence from Deevi in view of Ritzert. Withdrawal of the rejection is respectfully requested.

Claim 2 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Herchenroeder in view of Ritzert. This rejection is respectfully traversed.

Applicant respectfully submits that Herchenroeder in view of Ritzert fails to teach and suggest all of the claim limitations of Claim 2. Herchenroeder and Ritzert have been discussed above.

Claim 2 also requires that the composition comprising at least part of the hafnium be present as finely divided oxide particles. As noted above, Ritzert fails to teach an Ni-Cr-Fe alloy composition, comprising hafnium, wherein at least part of the hafnium is present as hafnium oxide particles added to the alloy composition.

For the foregoing reasons, Claim 2 is believed to be patentable over Herchenroeder in view of Ritzert. Withdrawal of the rejection is respectfully requested.

Claims 1, 3-4, 7-13 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Yabuki (JP 60-026644, hereinafter “Yabuki”) with evidence from Deevi in view of Ritzert. This rejection is respectfully traversed.

The Action states that it would have been obvious to one of ordinary skill in the art at the time the invention was made to have added high purity fine particles

such as hafnium oxide, as disclosed by Ritzert, to the high temperature alloy, as disclosed by Yabuki with evidence from Deevi, in order to improve high temperature reinforcement, as disclosed by Ritzert. Applicants respectfully disagree, at least for the reasons stated above under the 35 U.S.C. § 103(a) rejection over Klöwer with evidence from Deevi in view of Ritzert.

Yabuki is drawn to heat resistant Fe-Ni-Cr alloys, especially alloys for use in a hot combustion atmosphere (Yabuki, abstract, lines 1-3). The compositions of the various alloys in Yabuki are recited on pages 4-6 and generally in the abstract.

The Action states that it would be expected that the nickel-chromium-iron alloy disclosed in Yabuki would also have 0.013 weight percent oxygen and 0.013 percent nitrogen as disclosed by Deevi (Action at pages 32, 35, and 37 with respect to Claims 1, 7, and 8 of the present application). However, as described above, Deevi relates to Ni-Al intermetallic materials and differs from the compositions of Yabuki and the present application and in the methods of making such alloys (Exo-Melt process versus melting and casting). For example, comparing Table 6 on page 25 of Deevi with the compositions taught in Yabuki and in the exemplified embodiments of the present application reveals various differences that would impact the concentrations of the oxygen and nitrogen. As such, Deevi cannot be used as evidence of nitrogen and oxygen concentrations in the compositions of Yabuki.

Furthermore, Yabuki fails to teach or suggest that at least part of the hafnium is present as finely divided oxide particles. This deficiency is not cured by Ritzert since Ritzert fails to teach compositions comprising hafnium oxide

particles which are added to the alloy composition. Only $ZrO_2-14Y_2O_3-5HfO_2$ fibers are taught in Ritzert and these fibers are not finely divided hafnium oxide particles as recited in the various exemplified embodiments of the present invention. Claims 15-16 are presently cancelled and thus the present rejection of these claims is now rendered moot.

For the foregoing reasons, Claim 1 and its dependent Claims 3-4, 7-13 and 20 are believed to be patentable over Yabuki with evidence from Deevi in view of Ritzert. Withdrawal of the rejection is respectfully requested.

Claim 2 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Yabuki in view of Ritzert. This rejection is respectfully traversed.

Claim 2 also requires that the composition comprises at least part of the hafnium and be present as finely divided oxide particles. As noted above, Ritzert fails to teach an Ni-Cr-Fe alloy composition, comprising hafnium, wherein at least part of the hafnium is present as hafnium oxide particles added to the alloy composition.

For the foregoing reasons, Claim 2 is believed to be patentable over Yabuki in view of Ritzert. Withdrawal of the rejection is respectfully requested.

DOUBLE PATENTING

Claims 1-3, 11, 15 and 16-19 are provisionally rejected under 35 U.S.C. 101 as claiming the same invention as that of claims 42-44, 49 and 52-57 of co-pending Application No. 10/533,034.

For the sole purpose of clarifying the record, Applicant interprets the present double patenting rejection in that Claim 1 is alleged to be the same invention as recited in Claim 42, Claim 2 as in Claim 43, Claim 3 as in Claim 44, Claim 11 as in Claim 49, Claim 18 as in Claim 56 and Claim 19 as in Claim 57.

Applicants have amended Claims 1 and 2 to recite a cobalt percentage by weight range of 0 – 2.05%. Support for this amendment can be found in the International Publication No. WO 2004/042101 on pages 4 and 6 and in originally filed Claim 4. Claim 3 has been amended to recite a silicon percentage by weight of 0.01 to 2.5%. Support for this amendment can be found in the International Publication No. WO 2004/042101 in original Claim 2. Claim 11 depends on amended Claim 1 and is therefore not the same as Claim 49 in the co-pending Application No. 10/533,034. Claims 15 and 16 have been cancelled herein. Claims 18 and 19 both depend on Claims 1-3 which are presently amended and therefore Claims 18 and 19 of the instant application are distinguished from Claims 56 and 57 in the co-pending Application No. 10/533,034.

Claims 4-8, 12-14 and 18-19 are provisionally rejected on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claims 45, 48, 50-51, and 60 of co-pending Application No. 10/533,034.

The Applicant has timely filed a terminal disclaimer herewith in compliance with 37 CFR 1.321 (c) to overcome the provisionally rejected Claims 4-8, 12-14 and 18-19 over Claims 45, 48, 50-51 and 60 of co-pending Application No. 10/533,034.

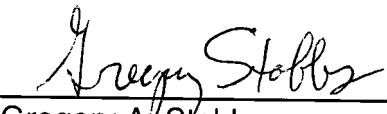
Accordingly, Applicant respectfully submits that all of the alleged double patenting rejections and provisional non-statutory obviousness-type double patenting rejection have been rendered moot. Withdrawal of the rejection is respectfully requested.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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